Revised 12/03

DUE DATE

DIST.

DEGENHART, K. R. DIETER, T. J.

DIETERLE, S. E.

FERRERA, D. W

GIACOMINI, J. J. LINDSAY, D. C

LONG, J. W. LYLE, J. I

NORTH, K PARKER, A. M.

MARTINEZ, L. A NAGEL, R. E NESTA S

RODGERS, A. D SHELTON, D. C.

SPEARS, M. S TUOR, N. R.

WIEMELT, K

WILLIAMS, J.

ZAHM, C

ACTION

CORRES. CONTROL INCOMING LTR NO.

00107 RF04

RECEIVED

Bill Owens, Governor

Douglas H. Benevento, Executive Merror PONDENCE

Dedicated to protecting and improving विशेषि विशेष environment of the people of Colorado

4300 Cherry Creek Dr. S. Denver, Colorado 80246-1530 Phone (303) 692-2000

http://www.cdphe.state.co.us

February 20, 2004

8100 Lowry Blvd. Denver, Colorado 80230-6928 (303) 692-3090

Laboratory and Radiation Services Division

TDD Line (303) 691-7700 Located in Clendale, Colorado Colorado Department of Public Health and Environment

BERARDINI, J.H. x BOGNAR, E.S. BROOKS, L. BUTLER. ? CARPENTER, M. CROCKETT, G. A.

LTR ENC

X

Mr. Joseph Legare Assistant Manager for Environment and Stewardship U.S. Department of Energy Rocky Flats Field Office 10808 Highway 93, Unit A Golden, Colorado 80403-8200

Approval: No Further Accelerated Action (NFAA), PAC 500-169 Waste Drum Peroxide Burial RE:

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants NFAA approval for the subject unit.

We have reviewed the revised Historical Release Report (HRR) description of the unit (February 2004), which includes a discussion of efforts to substantiate the incident. We have also considered the potential for residual environmental damage stemming from releases of hydrogen peroxide following burial or, as included in the description, through the rupture of a drum in transport.

The Division agrees with the assessment that the decomposition of hydrogen peroxide whether buried and subsequently released, or released directly into the environment, does not require a remedial effort. This determination is especially appropriate given the passage of time.

We have discussed with your contractors the need to consider an anomaly, detected with Ground Penetrating Radar (GPR), in the course of other remediation efforts or closeouts. The anomaly remains of interest to the Division, but is outside the scope of PAC 500-169.

If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or Harlen Ainscough at 303-692-3337.

Mark Sattelberg, U.S.F

Dave Shelton, KH

COR. CONTROL ADMIN. RECORD

Sincerely,

Reviewed for Addresses Corres, Control REP

Date

Steven H. Gunderson RFCA Project Coordinator

Mark Aguilar, EPA Norma Castaneda, DOE

Lane Butler, KH

Administrative Records Building T130G

H:\RFETS\500-169 PAC Waste Drum Peroxide Burial-NFAA-App.doc

Ref. Ltr #

cc:

DOE ORDER #

IA-A-001990